

Castel NYSD Chambers

From: Jeffrey Wilson <jwilson@wilsonchanlaw.com>
Sent: Thursday, March 25, 2021 6:49 AM
To: Castel NYSD Chambers
Cc: James H. Moon
Subject: Initial Pre-Trial Conference - Cheng v. T-Mobile - Case No. 21-cv-1085
Attachments: PastedGraphic-7.tiff

CAUTION - EXTERNAL:

*Conference adjourned
from April 12 to
May 6, 2021 at 12:00 P.M.
SO ORDERED
[Signature] USDC
3-26-21*

Dear Judge Castel,

Our firm represents Plaintiff Calvin Cheng in the above-referenced case. Per the Court's order dated February 9, 2021, an Initial Pre-Trial Conference is currently scheduled for April 12, 2021. I have spoken and write with the consent of Defendant T-Mobile's corporate counsel (copied here) to address the Court directly. Plaintiff filed an Amended Complaint on or about February 17, 2021 to add some additional facts and Defendant agreed to waive service of process on the same day. While Defendant has not yet appeared, their time to do so (or, alternatively, move) will not expire prior to the Initial Pre-Trial Conference. Defendant's corporate counsel copied here is based in California and, we gather, a decision on who precisely will appear on behalf of Defendant in this action or whether the Defendant will move prior to answering has not yet been made.

As such, we would ask the Court's indulgence for a brief adjournment of the Initial Pre-Trial Conference at least until after the 60 day period afforded by the Waiver of the Service of Summons is expired (on or about April 19, 2021).

The parties are happy to have a joint call with the Court if that is necessary and thank the Court for its consideration of this request.

Best Regards,

Jeffrey L. Wilson

Jeffrey L. Wilson, Esq. | Wilson & Chan, LLP | 733 Third Avenue, 16th Fl. | New York, NY 10017 | tel: (917) 732-3255 | fax: (646) 417-7879 | jwilson@wilsonchanlaw.com | www.wilsonchanlaw.com

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